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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

PHILLIP R. CORVELLO, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

v.

WELLS FARGO BANK N.A. d/b/a
WELLS FARGO HOME MORTGAGE
d/b/a AMERICA'S SERVICING
COMPANY,

Defendant.

Case No. 4:10-CV-05072-VC

**DECLARATION OF JOHN SHORE RE:
COMMUNITY HOUSING COUNCIL OF
FRESNO**

CLASS ACTION

Judge: Honorable Vince Chhabria

Courtroom: 4, 17th Floor

Date Filed: November 9, 2010

AMIRA JACKMON, individually, and on
behalf of others similarly situated,

Plaintiff,

v.

AMERICA'S SERVICING COMPANY
and WELLS FARGO BANK, N.A.,

Defendant.

Case No. 3:11-cv-03884-VC

Date Filed: August 8, 2011

1 I, JOHN SHORE, declare as follows:

2 1. I am the Executive Director of the Community Housing Council of Fresno
3 (“CHC”). I have personal knowledge of the matters stated herein and, if called upon, I could
4 and would competently testify thereto. I submit this declaration in connection with Plaintiffs’
5 Motion for Preliminary Approval of Class Action Settlement, which includes a request that the
6 proposed Settlement include CHC as the *cy pres* recipient of any leftover funds.

7 2. Founded in 1993, CHC is a 501(c)(3) non-profit whose purpose is to promote
8 fair housing opportunities and to encourage home ownership and preservation by providing
9 education, counseling and financial management services to families and individuals seeking
10 homeownership, with a special emphasis toward low to moderate income families, as well as
11 minority and non-English speaking families. A substantial portion of CHC’s work is
12 specifically devoted to helping homeowners seeking mortgage modifications and facing
13 foreclosure. CHC is a HUD approved Housing Counseling Agency for Default and Loss
14 Mitigation Counseling.

15 3. CHC offers a variety of HUD approved education and one-on-one
16 advocacy/counseling on behalf of homeowners with lenders and their servicers. CHC is among
17 the top five most active housing counseling agencies in California for promoting and
18 administering the Keep Your Home California program. This program has resulted in over
19 75,000 families statewide receiving financial assistance from the funds made available to
20 California by the U.S. Treasury’s hardest hit funds program. CHC promotes and provides
21 workshops and webinars to educate families on topics such as fair housing and lending laws,
22 mortgage fraud and predatory lending.

23 4. Although CHC’s name suggests that the work it does is limited to Fresno,
24 California, we work with homeowners throughout California and beyond. Historically,
25 because of the nature of the federal National Foreclosure Mitigation Counseling (“NFMCM”) program,
26 most counseling agencies were funded to offer services in their local service area.
27 There were no state-wide counseling organizations that provided assistance to homeowners
28 facing modifications and foreclosure. While there remains no nominal state-wide organization,

1 because of the outsized impact the 2007-2008 Great Recession and subsequent foreclosure
 2 crisis, coupled with the increased and widespread use of technology for the very purpose of
 3 providing mortgage education and counseling, we now provide our services throughout
 4 California.

5 5. We have greatly expanded our services to offer them statewide through the
 6 Virtual Counselor Network (“VCN”). The VCN is a statewide network of counselors
 7 providing services via the internet. This innovative program allows anyone who has access to
 8 the internet to connect to a counselor via video conferencing. All of our counselors are
 9 certified by VCN, allowing us to offer HUD approved counseling services throughout the
 10 state. The VCN has a central call center that distributes clients to the appropriate agency for
 11 counseling. The VCN is a program of the Housing Opportunities Collaborative, a 501(c)(3)
 12 nonprofit HUD approved intermediary organization.

13 6. Much of our Keep Your Home California work is done through telephone
 14 counseling. As a result, a significant amount of the work we perform through Keep Your
 15 Home California is state-wide.

16 7. Lastly, CHC was one of the only agencies to offer web based counseling for the
 17 Federal Housing Administration’s program called “Back To Work.” This special program
 18 allowed homeowners who lost their homes to purchase again just one year later if they had
 19 experienced an economic event such as foreclosure, short sale, deed-in-lieu and/or bankruptcy.
 20 To qualify for this program, the applicant had to receive counseling through a HUD approved
 21 agency. CHC has regularly provided these counseling classes online throughout the state (and
 22 nationwide).

23 8. If CHC is fortunate enough to receive a *cy pres* distribution from the settlement,
 24 it will be used to provide education and counseling for California homeowners struggling with
 25 their mortgage obligations. While most of the country has experienced recovery from the
 26 housing crisis, much of California has not. Meanwhile, the NFMC funding has ended. Any *cy*
 27 *pres* distribution will be used to meet the high demand CHC continues to experience for
 28 mortgage default education and counseling.

1 I declare under penalty of perjury under the laws of the United States of America that
2 the foregoing is true and correct. Executed on June 29, 2017, at Fresno, California.

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4 By: 
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